

Anne Scott

April 18, 2023
Pages 2 to 5

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<p>1 MIFAMILIA VOTA, et al.)(</p> <p>2 Plaintiffs)(</p> <p>3 VS.)(CASE NO.</p> <p>4)(5:21-cv-0920-XR</p> <p>5 GREG ABBOTT, et al.)(</p> <p>6 Defendants)(</p> <hr/> <p>6 UNITED STATES OF AMERICA)(</p> <p>7 Plaintiff)(</p> <p>8 VS.)(CASE NO.</p> <p>9)(5:21-cv-1085-XR</p> <p>10 THE STATE OF TEXAS, et al.)(</p> <p>11 Defendants)(</p> <hr/> <p>12 ORAL AND VIDEOTAPED DEPOSITION OF</p> <p>13 ANNE SCOTT</p> <p>14 APRIL 18, 2023</p> <hr/> <p>15 ORAL AND VIDEOTAPED DEPOSITION OF ANNE SCOTT,</p> <p>16 produced as a witness at the instance of the State</p> <p>17 Defendants, taken in the above-styled and numbered</p> <p>18 cause on APRIL 18, 2023, between the hours of 9:44 a.m.</p> <p>19 and 11:04 a.m., reported stenographically by DONNA</p> <p>20 McCOWN, Certified Court Reporter No. 6625, in and for</p> <p>21 the State of Texas, at 7030 Mile 2 3/4 East, Mercedes,</p> <p>22 Texas, pursuant to the Federal Rules of Civil Procedure</p> <p>23 and any provisions stated on the record or attached</p> <p>24 therein.</p> <p>25</p>	<p>1 COUNSEL FOR PLAINTIFF UNITED STATES OF AMERICA:</p> <p>2 DANIEL J. FREEMAN, via Zoom</p> <p>3 U.S. DEPARTMENT OF JUSTICE</p> <p>4 950 Pennsylvania Avenue NW, 4CON 8.143</p> <p>5 Washington, DC 20530</p> <p>6 COUNSEL FOR PLAINTIFFS LA UNION DEL PUEBLO ENTERO,</p> <p>7 et al.:</p> <p>8 PATRICK BERRY, via Zoom</p> <p>9 BRENNAN CENTER FOR JUSTICE</p> <p>10 120 Broadway, Suite 1750</p> <p>11 New York, New York 10271</p> <p>12 ALSO PRESENT:</p> <p>13 Rene Ortiz, Videographer</p> <p>14 INDEX</p> <p>15</p> <p>16 Appearances 2</p> <p>17 ANNE SCOTT</p> <p>18 Examination by Mr. Bryant 6</p> <p>19 Examination by Ms. Snead 44</p> <p>20 Errata Sheet/Signature Page 46</p> <p>21 Reporter's Certificate 48</p> <p>22 Attached to the end of the transcript: Stipulations</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 APPEARANCES</p> <p>2 COUNSEL FOR STATE DEFENDANTS:</p> <p>3 DAVID BRYANT</p> <p>4 OFFICE OF THE TEXAS ATTORNEY GENERAL</p> <p>5 P.O. Box 12548</p> <p>6 Austin, Texas, 78711-2548</p> <p>7 COUNSEL FOR DEFENDANT HIDALGO COUNTY ELECTIONS</p> <p>8 ADMINISTRATOR:</p> <p>9 LEIGH ANN TOGNETTI</p> <p>10 HIDALGO COUNTY DISTRICT ATTORNEY'S OFFICE</p> <p>11 100 East Cano Street</p> <p>12 Edinburg, Texas 78539</p> <p>13 COUNSEL FOR INTERVENOR DEFENDANTS:</p> <p>14 STEPHEN KENNY, via Zoom</p> <p>15 JONES DAY</p> <p>16 51 Louisiana Avenue, NW</p> <p>17 Washington, DC 20001</p> <p>18 COUNSEL FOR PLAINTIFFS OCA-GREATER HOUSTON, et al.:</p> <p>19 LISA SNEAD</p> <p>20 DISABILITY RIGHTS TEXAS</p> <p>21 222 West Braker Lane</p> <p>22 Austin, Texas, 78758-1024</p> <p>23 LUCIA ROMANO, via Zoom</p> <p>24 DISABILITY RIGHTS TEXAS</p> <p>25 1500 McGowen, Suite 100</p> <p>Houston, Texas 77004</p> <p>CHRISTOPHER MCGREAL, via Zoom</p> <p>DISABILITY RIGHTS TEXAS</p> <p>1420 West Mockingbird Lane, Suite 450</p> <p>Dallas, Texas 75247</p> <p>COUNSEL FOR PLAINTIFFS HOUSTON AREA URBAN LEAGUE,</p> <p>et al.:</p> <p>DESTINY LOPEZ, via Zoom</p> <p>REED SMITH, LLP</p> <p>355 South Grand Avenue No. 2900</p> <p>Los Angeles, California, 90071</p>	<p>1 EXHIBITS</p> <p>2 NUMBER DESCRIPTION PAGE</p> <p>3 1 Notice of Deposition 27</p> <p>4 2 Sixth Supplemental Initial Disclosures .. 27</p> <p>5 3 REV UP Website Pages 34</p> <p>6 4 The Arc of Texas Website Pages 35</p> <p>7 5 Texas Secretary of State Website Pages .. 37</p> <p>8 6 Impact Report, The Arc of Texas 38</p> <p>9 7 Texas Department of Public Safety Website</p> <p>10 Pages 39</p> <p>11 8 Texas by Texas Webpages 42</p> <p>12 9 Texas by Texas Welcome Webpage 43</p> <p>13 10 Texas Department of Public Safety</p> <p>14 Website Pages 43</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

Defendant's
Exhibits

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<p style="text-align: right;">Page 10</p> <p>1 retained Lisa as your attorney?</p> <p>2 A. Well, they contacted us.</p> <p>3 Q. Who is they?</p> <p>4 A. REV UP contacted us.</p> <p>5 Q. And what did they say?</p> <p>6 A. They -- they said that we understand you all</p> <p>7 had some difficulty. Taylor had difficulty voting, and</p> <p>8 which she did. She didn't get a ballot, so...</p> <p>9 Q. Let's talk about that. How far are you from</p> <p>10 your nearest polling place?</p> <p>11 A. We are approximately 2 miles.</p> <p>12 Q. Okay. So you're in the city limits of</p> <p>13 Mercedes, Texas?</p> <p>14 A. No, we are not.</p> <p>15 Q. Okay. And about how far are you from downtown</p> <p>16 Mercedes?</p> <p>17 A. 2 -- 2 and a half miles or 2 miles. You know,</p> <p>18 I don't know exactly.</p> <p>19 Q. Okay. And how long have you been voting in</p> <p>20 this area?</p> <p>21 A. Not very long. Just a couple of years.</p> <p>22 Q. Okay. And is there a reason why you didn't</p> <p>23 vote prior to a couple of years ago?</p> <p>24 A. It just didn't interest me.</p> <p>25 Q. And what caused you a couple of years ago to</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. Okay. Did you do anything in 2020 to be sure</p> <p>2 that your -- your ballot by mail was counted, or did</p> <p>3 you just assume you sent it in and it --</p> <p>4 A. I assumed.</p> <p>5 Q. -- would be counted?</p> <p>6 A. I assumed, yes.</p> <p>7 Q. Okay. So you don't have specific</p> <p>8 information --</p> <p>9 A. No, I do not.</p> <p>10 Q. -- as to whether or not it was counted in the</p> <p>11 2020 general election?</p> <p>12 MS. SNEAD: Try to let him finish his</p> <p>13 question and then answer.</p> <p>14 THE WITNESS: Oh, sorry.</p> <p>15 MS. SNEAD: That's okay.</p> <p>16 Q. I think that was a perfect example of you --</p> <p>17 you correctly knew what I was about to ask, and you</p> <p>18 started answering it before I could get all the --</p> <p>19 A. Sorry.</p> <p>20 Q. -- all the words out there.</p> <p>21 And after the 2020 general election, what</p> <p>22 is the next election in which you voted?</p> <p>23 A. In 2022.</p> <p>24 Q. Okay. Did you vote in the 2022 primary</p> <p>25 election, general election, or both?</p>
<p style="text-align: right;">Page 11</p> <p>1 become interested in voting?</p> <p>2 A. I just felt that it was our duty to do that,</p> <p>3 and so did it.</p> <p>4 Q. What is the first election in which you</p> <p>5 personally voted?</p> <p>6 A. 2020. No, that wasn't my first election. I</p> <p>7 had done so -- we used to live in Cameron County, and I</p> <p>8 voted there, but --</p> <p>9 Q. I'm sorry. I didn't understand where you</p> <p>10 lived.</p> <p>11 A. We used to live in Cameron County years and</p> <p>12 years ago, and I had voted there.</p> <p>13 Q. You said the first election you voted in in</p> <p>14 recent years was the 2020 election. Was that a primary</p> <p>15 election or a general election or both?</p> <p>16 A. It was a general election.</p> <p>17 Q. Okay. Was that also the first election in</p> <p>18 which your daughter Taylor voted?</p> <p>19 A. That is correct.</p> <p>20 Q. In 2020, how did you cast your ballot, in</p> <p>21 person or by mail?</p> <p>22 A. By mail.</p> <p>23 Q. And in 2020, how did your daughter Taylor cast</p> <p>24 her ballot?</p> <p>25 A. By mail.</p>	<p style="text-align: right;">Page 13</p> <p>1 A. General election only.</p> <p>2 Q. In the 2022 general election, did you vote in</p> <p>3 person or by mail or both?</p> <p>4 A. Both.</p> <p>5 MS. SNEAD: Objection, form. Can you</p> <p>6 clarify what you mean by voted both.</p> <p>7 Q. Both meaning did you both vote by mail and vote</p> <p>8 in person.</p> <p>9 MS. SNEAD: Objection, form.</p> <p>10 Q. You can go ahead and answer the question.</p> <p>11 MS. SNEAD: Yeah, you --</p> <p>12 Q. If you -- if you need for me to clarify it,</p> <p>13 please feel free to ask me to do so.</p> <p>14 MS. SNEAD: You can answer unless I tell</p> <p>15 you not to answer when I object.</p> <p>16 A. Okay. All right.</p> <p>17 I got a ballot. I filled it out by mail.</p> <p>18 It was returned to me. I don't know why, but it was</p> <p>19 returned back to me. So that's when we voted in</p> <p>20 person.</p> <p>21 I took my ballot to the polls so they</p> <p>22 could see that I'm returning it, and I gave it to the</p> <p>23 election judge, and then I voted in person.</p> <p>24 Q. Okay. Did your daughter Taylor also vote in</p> <p>25 the 2022 general election?</p>

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<p style="text-align: right;">Page 14</p> <p>1 A. Yes, sir.</p> <p>2 Q. And did she also vote in person?</p> <p>3 A. Yes, sir.</p> <p>4 Q. In connection with the 2022 general election,</p> <p>5 did you submit an application for a mail-in ballot?</p> <p>6 A. Yes, sir.</p> <p>7 Q. And did your daughter Taylor also submit an</p> <p>8 application for a mail-in ballot?</p> <p>9 A. I submitted one for her.</p> <p>10 Q. And did you provide on your application for a</p> <p>11 mail-in ballot an identification number of some kind?</p> <p>12 A. Yes, sir.</p> <p>13 Q. What type of identification number did you</p> <p>14 submit with your application for a ballot by mail in</p> <p>15 the 2022 general election?</p> <p>16 A. I believe I submitted my passport number.</p> <p>17 Q. Did you submit only one number, or did you</p> <p>18 submit multiple numbers?</p> <p>19 A. I think it was just the one number on the</p> <p>20 passport.</p> <p>21 Q. Was that a United States passport that was</p> <p>22 still active --</p> <p>23 A. Yes.</p> <p>24 Q. -- not expired?</p> <p>25 A. Yes, sir.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Approximately when did you do that?</p> <p>2 A. There again, I really don't remember the date.</p> <p>3 I'm sorry. I just --</p> <p>4 Q. Okay. And sometime after you submitted your</p> <p>5 mail-in ballot in connection with the 2022 general</p> <p>6 election, did you receive some type of communication or</p> <p>7 return of that ballot prior to the general election?</p> <p>8 A. I -- I received the ballot back before the</p> <p>9 election, yes.</p> <p>10 Q. Okay. When you received your mail-in ballot</p> <p>11 back, do you know if you received it from the Hidalgo</p> <p>12 County Election Office or from the U.S. Postal Service</p> <p>13 or from whom?</p> <p>14 A. It was the election office, because it was</p> <p>15 stamped.</p> <p>16 Q. And what did the stamp say on it?</p> <p>17 A. It just said "return" -- I don't even remember</p> <p>18 what it said, but there was a stamp on it, and it said</p> <p>19 return for more information or something. I don't</p> <p>20 really recall, but it was stamped by the Hidalgo County</p> <p>21 Election Office.</p> <p>22 Q. I take it from that answer that you don't</p> <p>23 recall what specific information the Hidalgo County</p> <p>24 Election Office indicated you needed to provide in</p> <p>25 order to -- or to have a mail-in ballot that they would</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. And approximately when did you submit that</p> <p>2 application for a mail-in ballot in connection with the</p> <p>3 2022 general election?</p> <p>4 A. I'm sorry. I really don't remember. It was</p> <p>5 during early -- it was before early voting, I believe.</p> <p>6 And I'm sorry. I don't really remember the date.</p> <p>7 Q. After you submitted that application for a</p> <p>8 mail-in ballot, did you receive a mail-in ballot?</p> <p>9 A. I did, yes.</p> <p>10 Q. Approximately, when did you receive that</p> <p>11 mail-in ballot for the 2022 general election?</p> <p>12 A. I'm sorry. I don't remember.</p> <p>13 Q. I believe you said that you filled in your</p> <p>14 mail-in ballot once you had received it; is that</p> <p>15 correct?</p> <p>16 A. That is correct.</p> <p>17 Q. And did you submit an identification number or</p> <p>18 numbers of some kind on that mail-in ballot?</p> <p>19 A. Yes, sir.</p> <p>20 Q. What identification number or numbers did you</p> <p>21 submit?</p> <p>22 A. My United States passport number.</p> <p>23 Q. And did you mail in that mail-in ballot to the</p> <p>24 proper address in Hidalgo County?</p> <p>25 A. Yes, sir.</p>	<p style="text-align: right;">Page 17</p> <p>1 accept?</p> <p>2 A. That is correct.</p> <p>3 Q. Did you attempt to get any help from anyone to</p> <p>4 try to determine what you needed to do to provide</p> <p>5 information requested by the Hidalgo County Election</p> <p>6 Office so your mail-in ballot would be accepted?</p> <p>7 A. No, I did not contact anyone.</p> <p>8 Q. Why did you not contact anyone to get some</p> <p>9 assistance in that matter?</p> <p>10 A. Well, I was going to have to transport Taylor</p> <p>11 over to -- because she did not get a ballot, so I</p> <p>12 figured, well, if I have to transport Taylor over</p> <p>13 there, I might as well take my ballot in hand and do it</p> <p>14 there in Mercedes at the polls.</p> <p>15 Q. At any time prior to completing the mail-in</p> <p>16 ballot for the 2022 general election, did you do</p> <p>17 anything to get information about what types of</p> <p>18 identification numbers were required or acceptable?</p> <p>19 A. No. I figured a U.S. passport would be fine.</p> <p>20 I didn't use my driver's license because my name is</p> <p>21 misspelled, and so it's not my correct name. So</p> <p>22 that -- I use that as a form of identification wherever</p> <p>23 I go, and it seems to work.</p> <p>24 Q. In 2022, did you have a valid Texas driver's</p> <p>25 license?</p>

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<p style="text-align: right;">Page 18</p> <p>1 A. Yes, I do.</p> <p>2 Q. In 2022, did you have a Social Security number?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Did you consider submitting the last four</p> <p>5 digits of your Social Security number on the</p> <p>6 application for mail-in ballot or on the mail-in ballot</p> <p>7 as an identification number?</p> <p>8 A. I believe I did also, but I can't remember</p> <p>9 if -- if I did or not, but I -- if it -- if they asked</p> <p>10 for it, I'm sure I did.</p> <p>11 Q. Did you look at anything either online or any</p> <p>12 materials in paper form to determine whether or not a</p> <p>13 passport number was an acceptable form of</p> <p>14 identification for voting in Texas?</p> <p>15 A. I assume a passport would -- a valid passport</p> <p>16 would be just about the best identification you could</p> <p>17 have.</p> <p>18 Q. My question was whether you did anything to --</p> <p>19 A. No.</p> <p>20 Q. -- determine that rather than just assume.</p> <p>21 A. No.</p> <p>22 Q. When -- strike that.</p> <p>23 When did your daughter first register to</p> <p>24 vote?</p> <p>25 A. Before the 2020 election, but I can't remember</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. In 2022, did you or Taylor take any steps to</p> <p>2 attempt to renew her Texas state ID card?</p> <p>3 A. No, sir.</p> <p>4 Q. What was the reason for not taking any steps</p> <p>5 like that in 2022?</p> <p>6 A. I guess just being lazy.</p> <p>7 Q. And have you or Taylor taken any steps in 2023</p> <p>8 so far to attempt to renew her Texas state ID card?</p> <p>9 A. No, we have not.</p> <p>10 Q. Is there any reason for that?</p> <p>11 A. Taylor still does not go out in the public,</p> <p>12 normally. She does go to day care. Everyone wears a</p> <p>13 mask. Most people at day care are medically fragile.</p> <p>14 They're tested once a week for COVID. So it's kind of</p> <p>15 a closed situation.</p> <p>16 So Taylor goes to day care and comes home,</p> <p>17 and that's pretty much it for her. Like a lot of</p> <p>18 medically fragile people, we have to be very careful.</p> <p>19 She is up-to-date on her COVID shots and everything,</p> <p>20 but we still worry about her because of her medical</p> <p>21 condition.</p> <p>22 Q. Does your daughter Taylor have a Social</p> <p>23 Security number?</p> <p>24 A. Yes, she does.</p> <p>25 Q. How long has she had a Social Security number,</p>
<p style="text-align: right;">Page 19</p> <p>1 the exact date.</p> <p>2 Q. In 2022, did your daughter have a Texas</p> <p>3 driver's license?</p> <p>4 A. She had an expired Texas ID.</p> <p>5 Q. Okay. So she did not have a driver's license,</p> <p>6 but she had a state ID card?</p> <p>7 A. Yes, sir.</p> <p>8 Q. And how long had she had a Texas state ID card?</p> <p>9 A. I'm going to say since she was 20 years old.</p> <p>10 It went through two cycles of renewal, because I did it</p> <p>11 online once, so...</p> <p>12 Q. And when did the state ID card expire in the</p> <p>13 year or two prior to the general election in 2022?</p> <p>14 A. It expired Taylor's birthday 10-25-2020.</p> <p>15 Q. Did you or Taylor take any steps to try to</p> <p>16 renew her state ID card in 2019, 2020, or 2021?</p> <p>17 A. No.</p> <p>18 Q. Is there a reason why neither of you took any</p> <p>19 steps to renew her Texas state ID card during those</p> <p>20 years?</p> <p>21 A. Taylor is medically fragile, and this was</p> <p>22 during COVID, and Taylor didn't even leave the house</p> <p>23 for quite -- quite a while. So I already had renewed</p> <p>24 it over -- online previously, so I couldn't do it</p> <p>25 again. So that's the story on that.</p>	<p style="text-align: right;">Page 21</p> <p>1 roughly?</p> <p>2 A. Probably since she was born.</p> <p>3 Q. By the way, I forgot to say, but I want to say</p> <p>4 any time you want to take a break, feel free to call a</p> <p>5 break. If you have to take care of the dog or anything</p> <p>6 else, please feel free.</p> <p>7 A. I'm fine.</p> <p>8 Q. Okay. So what caused Taylor to have an</p> <p>9 interest for the first time in voting in 2022, if</p> <p>10 that's the first time she expressed that interest?</p> <p>11 MS. SNEAD: Objection, form.</p> <p>12 THE WITNESS: I can still answer the</p> <p>13 question?</p> <p>14 MS. SNEAD: Yes.</p> <p>15 A. I think -- I think just -- just listening to</p> <p>16 the news, and she just decided, "Hey, it's my right. I</p> <p>17 would like to vote, Mom," you know. There was a lot of</p> <p>18 people trying to get out to vote.</p> <p>19 Q. I may have made an error in my question. Did</p> <p>20 she first vote in 2020?</p> <p>21 A. Yes.</p> <p>22 Q. Okay.</p> <p>23 A. That is correct.</p> <p>24 Q. I asked you about 2022 --</p> <p>25 A. Oh, okay. Okay.</p>

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Pages 22 to 25

<p style="text-align: right;">Page 22</p> <p>1 Q. -- as if it were the first time she voted --</p> <p>2 A. Yeah, yeah.</p> <p>3 Q. -- but it was actually 2020. So is your answer</p> <p>4 the same as to what caused her to first express an</p> <p>5 interest in voting ahead of the 2020 general election?</p> <p>6 A. Yes, sir. My answer is the same.</p> <p>7 Q. Okay. In connection with the 2022 general</p> <p>8 election, I believe you testified that you -- you</p> <p>9 filled out all or part of her application for a mail-in</p> <p>10 ballot, and I'm referring to your daughter Taylor?</p> <p>11 A. Yes. Taylor does not write.</p> <p>12 Q. Okay. And did you sign her name in connection</p> <p>13 with that application?</p> <p>14 A. I sign -- I printed her name and put probably</p> <p>15 "mother" in parenthesis, but she has a mark, so she put</p> <p>16 that on the application.</p> <p>17 Q. Okay. And in connection with the actual</p> <p>18 mail-in ballot, who signed that?</p> <p>19 A. In 2020?</p> <p>20 Q. In -- I'm asking in 2022.</p> <p>21 A. Taylor did not get a ballot in 2022.</p> <p>22 Q. Okay. When -- strike that.</p> <p>23 If I understand you correctly, you</p> <p>24 received a ballot, but Taylor did not receive a mail-in</p> <p>25 ballot in connection with the 2022 general election?</p>	<p style="text-align: right;">Page 24</p> <p>1 in person early in connection with the 2022 general</p> <p>2 election, did you both go into the polling place?</p> <p>3 A. Yes, sir.</p> <p>4 Q. And did you have difficulties in going into the</p> <p>5 polling place and voting in person on that occasion?</p> <p>6 A. The ramp -- it's a two-story civic center</p> <p>7 because of flooding, and the ramp was extremely long,</p> <p>8 but once we were inside, the people were very helpful,</p> <p>9 and...</p> <p>10 Q. So aside from getting up the ramp, there were</p> <p>11 no special difficulties that you -- you and your</p> <p>12 daughter Taylor encountered in connection with voting</p> <p>13 in 2022?</p> <p>14 A. No, sir.</p> <p>15 Q. When you and your daughter went to the polls to</p> <p>16 vote in person in the 2022 general election, did</p> <p>17 anybody accompany you, or was it just the two of you?</p> <p>18 A. It was the two of us.</p> <p>19 Q. I forgot to ask what's your date of birth?</p> <p>20 A. It is 6-14-1955. I'm 67 years old.</p> <p>21 Q. You have the same birthday as my -- my father,</p> <p>22 but he was a lot older. He was older when I was born.</p> <p>23 MR. BRYANT: Okay. Let's take a short</p> <p>24 break, and then we're going to go through some</p> <p>25 documents.</p>
<p style="text-align: right;">Page 23</p> <p>1 A. That is correct.</p> <p>2 Q. Okay. When your daughter Taylor did not</p> <p>3 receive a mail-in ballot in connection with the 2022</p> <p>4 general election, did you contact anybody with Hidalgo</p> <p>5 County Election Office or otherwise to try to see why</p> <p>6 that occurred or to get her a mail-in ballot?</p> <p>7 A. No, sir.</p> <p>8 Q. Was there any reason why you did not do that?</p> <p>9 A. I -- usually, contacting county offices, you</p> <p>10 get the runaround, and it takes a while, so I -- I</p> <p>11 didn't contact anyone.</p> <p>12 (Off topic discussion.)</p> <p>13 Q. Did you go with your daughter Taylor to vote in</p> <p>14 person in the 2022 general election?</p> <p>15 A. Yes, sir.</p> <p>16 Q. And did you -- did the two of you vote early or</p> <p>17 on election day?</p> <p>18 A. We voted early.</p> <p>19 Q. What's your best estimate of the date on which</p> <p>20 you and your daughter Taylor voted in the 2022 general</p> <p>21 election?</p> <p>22 A. I'm sorry. It was a few days before early</p> <p>23 voting stopped, but I couldn't tell you the date. I'm</p> <p>24 sorry.</p> <p>25 Q. When you and your daughter Taylor went to vote</p>	<p style="text-align: right;">Page 25</p> <p>1 THE WITNESS: Okay.</p> <p>2 (Brief recess)</p> <p>3 Q. Ms. Scott, how much education have you had, if</p> <p>4 any, past high school?</p> <p>5 A. Excuse me?</p> <p>6 Q. How much education have you had, if any, past</p> <p>7 high school?</p> <p>8 A. Nothing past high school.</p> <p>9 Q. Okay. And generally, where did you grow up?</p> <p>10 A. I grew up on South Padre Island.</p> <p>11 Q. Have you worked outside the home extensively in</p> <p>12 your life?</p> <p>13 A. Yes.</p> <p>14 Q. Could you describe in general the kinds of work</p> <p>15 that you've done?</p> <p>16 A. I've been -- it's -- it's a lot of manual</p> <p>17 labor. I've been a fence installer. I've been a</p> <p>18 landscaper. I've worked in a nursery. I've worked in</p> <p>19 a retail nursery. I enjoy working outside.</p> <p>20 Q. Have you lived all your life in South Texas?</p> <p>21 A. No.</p> <p>22 Q. Where else have you lived?</p> <p>23 A. I've lived in Dallas.</p> <p>24 Q. How long did you live in Dallas?</p> <p>25 A. Until I was 16.</p>

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Pages 26 to 29

<p style="text-align: right;">Page 26</p> <p>1 Q. How many children do you have?</p> <p>2 A. Two.</p> <p>3 Q. We've spoken some about Taylor. What's the</p> <p>4 name of your other child?</p> <p>5 A. April Campbell.</p> <p>6 Q. And what's her current age?</p> <p>7 A. She is 49.</p> <p>8 Q. And where does she live?</p> <p>9 A. She lives in Hawaii. Waimea, Hawaii.</p> <p>10 Q. And how long has -- have you been married to</p> <p>11 Carl Scott?</p> <p>12 A. 46 years, or it will be.</p> <p>13 Q. And what type of work does he do or did he do</p> <p>14 if he no longer works?</p> <p>15 A. He still works. He's an owner of a wholesale</p> <p>16 nursery and has been for approximately 30 years.</p> <p>17 Q. What education has Taylor, your daughter, had?</p> <p>18 A. She's -- she didn't graduate from high school,</p> <p>19 but she went. She was a senior. That's her education.</p> <p>20 I would -- she's not up to grade level, so...</p> <p>21 Q. Okay. Could you describe the nature of</p> <p>22 Taylor's disabilities?</p> <p>23 A. She's had cerebral palsy since birth.</p> <p>24 Q. We're going to go through a few documents. I</p> <p>25 don't think I'm going to have to ask you a whole lot of</p>	<p style="text-align: right;">Page 28</p> <p>1 A. Probably about three months, two months. Two</p> <p>2 months. Let's say two months.</p> <p>3 Q. How long has Taylor Scott been a member of</p> <p>4 those two organizations?</p> <p>5 A. The same, two months.</p> <p>6 Q. And what caused you to join REV UP Texas and</p> <p>7 Arc of Texas a few months ago?</p> <p>8 A. Well, the information that they had and also</p> <p>9 this lawsuit. They sent me out some e-mails which is</p> <p>10 interesting.</p> <p>11 Q. Are you referring to e-mails about the lawsuit</p> <p>12 or --</p> <p>13 A. No.</p> <p>14 Q. -- other things?</p> <p>15 A. About overall what's going on with people,</p> <p>16 things that might affect people with disabilities, and</p> <p>17 I'm finding it quite interesting.</p> <p>18 Q. Were you aware of REV UP Texas prior to the</p> <p>19 2022 general election?</p> <p>20 A. No.</p> <p>21 Q. Were you aware of Arc of Texas prior to the</p> <p>22 2022 general election?</p> <p>23 A. Yes.</p> <p>24 Q. Had you ever been a member of The Arc of Texas</p> <p>25 prior to the 2022 general election?</p>
<p style="text-align: right;">Page 27</p> <p>1 questions about -- about them.</p> <p>2 A. Okay.</p> <p>3 Q. But I do want to mark them. I'm going to hand</p> <p>4 you what's been marked as Scott Exhibit No. 1, which</p> <p>5 appears to be a State Defendants' Amended Notice of</p> <p>6 Intent to Take the Oral and Videotaped Depositions of</p> <p>7 Anne Scott and Taylor Scott. Have you seen this</p> <p>8 document before?</p> <p>9 A. Yes, I have.</p> <p>10 Q. Okay. And approximately, when did you first</p> <p>11 see that?</p> <p>12 A. I -- I saw it yesterday.</p> <p>13 Q. Let me hand you what's been marked as Scott</p> <p>14 Exhibit No. 2. Ms. Scott, have you seen Scott</p> <p>15 Exhibit 2 before?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And I believe on page 4, No. 7, there's a</p> <p>18 reference to you and your daughter Taylor.</p> <p>19 A. Yes, sir.</p> <p>20 Q. It states that Anne and Taylor Scott are</p> <p>21 members of REV UP Texas and The Arc of Texas; is that</p> <p>22 correct?</p> <p>23 A. That is correct.</p> <p>24 Q. And how long have you been a member of those</p> <p>25 organizations?</p>	<p style="text-align: right;">Page 29</p> <p>1 A. No.</p> <p>2 Q. Have you had an occasion to look at the website</p> <p>3 of REV UP Texas at any point?</p> <p>4 A. No.</p> <p>5 Q. Have you had an occasion to look at the website</p> <p>6 of Arc of Texas at any point?</p> <p>7 A. I think I have recently, yes.</p> <p>8 Q. And have you sought out any information about</p> <p>9 issues relating to voters with disabilities from The</p> <p>10 Arc of Texas website?</p> <p>11 A. No.</p> <p>12 Q. Have you ever sought out information about</p> <p>13 voters with disabilities in any form from The Arc of</p> <p>14 Texas?</p> <p>15 A. No.</p> <p>16 Q. Have you ever sought out information about</p> <p>17 voters with disabilities and related issues from REV UP</p> <p>18 Texas?</p> <p>19 A. No.</p> <p>20 Q. How did it come about that you became a member</p> <p>21 of REV UP Texas, and by that, I mean did you contact</p> <p>22 someone or did someone contact you?</p> <p>23 MS. SNEAD: Objection, form.</p> <p>24 A. Someone contacted me.</p> <p>25 Q. And who was that?</p>

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Pages 34 to 37

<p style="text-align: right;">Page 34</p> <p>1 don't remember exactly.</p> <p>2 Q. Do you know if Marisol is an attorney?</p> <p>3 A. I believe she's a paralegal.</p> <p>4 Q. Is she located in this general area?</p> <p>5 A. No.</p> <p>6 Q. Where is she located?</p> <p>7 A. I believe she's located in Austin, but I'm not</p> <p>8 real sure. I believe so, though.</p> <p>9 Q. Have you spoken with other people who are not</p> <p>10 attorneys who are associated with REV UP Texas, Arc of</p> <p>11 Texas, or Texas Disability Rights?</p> <p>12 A. No.</p> <p>13 Q. Let me hand you what's been marked as Scott</p> <p>14 Exhibit No. 3. Could you take a moment and look</p> <p>15 through those and see if you recognize any of the pages</p> <p>16 of Scott Exhibit 3.</p> <p>17 I'll tell you that it's excerpts from the</p> <p>18 REV UP website, but they also incorporate some pages</p> <p>19 from the Texas Secretary of State's Vote Texas website.</p> <p>20 Just want to see if you recognize any of those.</p> <p>21 A. No, sir.</p> <p>22 Q. Okay. And I believe that you had testified</p> <p>23 earlier that you don't recall having looked at the --</p> <p>24 A. No.</p> <p>25 Q. -- REV UP Texas website --</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Now, when did you first become aware of a</p> <p>2 proposed or actual change in the Texas voting laws in</p> <p>3 2021?</p> <p>4 A. I knew that they were changing the -- it was</p> <p>5 probably after the 2020 election.</p> <p>6 Q. Okay. So you were aware that they were</p> <p>7 considering changing the voting laws in Texas prior to</p> <p>8 the time that the voting law changes had actually been</p> <p>9 passed by the Texas legislature?</p> <p>10 A. Yes. I read it in the paper or heard it on the</p> <p>11 news.</p> <p>12 Q. Okay. Do you recall expressing any views about</p> <p>13 that issue prior to the time that the Texas legislature</p> <p>14 passed the voting law changes in 2021?</p> <p>15 A. It felt like it was going to be more difficult</p> <p>16 for me to vote and for Taylor to vote, but -- or just</p> <p>17 everyone in general, but that was probably my view.</p> <p>18 Q. Did you express that to anybody?</p> <p>19 A. I'm sure I expressed it to my husband and to</p> <p>20 Taylor, and he probably agreed with me, whether he, you</p> <p>21 know, was listening or not.</p> <p>22 Q. Did you express your views on the proposed</p> <p>23 Texas voting law legislation to anyone outside your</p> <p>24 family?</p> <p>25 A. I doubt that.</p>
<p style="text-align: right;">Page 35</p> <p>1 A. Right.</p> <p>2 Q. -- at any point up until today.</p> <p>3 A. Yes, sir.</p> <p>4 Q. Let me hand you what's been marked Scott</p> <p>5 Exhibit No. 4.</p> <p>6 A. Okay.</p> <p>7 Q. And I'll ask you to go through that page by</p> <p>8 page and tell me if you recognize any portion of that</p> <p>9 document.</p> <p>10 A. I do recognize "eligible to vote by mail," but</p> <p>11 I don't recognize that it was on there. I read that.</p> <p>12 I did not specifically read that on The Arc, but I -- I</p> <p>13 have read that before, but like I said, I can't tell</p> <p>14 you I read that on that website.</p> <p>15 Q. Okay. When you refer to the "are you eligible</p> <p>16 to vote by mail" portion of the document, are you</p> <p>17 referring to the next to the last page of Scott</p> <p>18 Exhibit 4?</p> <p>19 A. That is correct. This area here, but I might</p> <p>20 have read that someplace else, maybe even in the paper.</p> <p>21 I -- I don't know.</p> <p>22 Q. Okay. That's an area that's about</p> <p>23 three-quarters of the way down the next to the last</p> <p>24 page?</p> <p>25 A. Yes, sir.</p>	<p style="text-align: right;">Page 37</p> <p>1 Q. You don't have any recollection of it, anyway?</p> <p>2 A. No, I don't have any recollection of it, if I</p> <p>3 did.</p> <p>4 Q. You didn't call your senator or your</p> <p>5 representative and --</p> <p>6 A. No. No, I did not.</p> <p>7 Q. Okay. Now, once the Texas legislature passed</p> <p>8 the voting law changes in 2021 that's sometimes</p> <p>9 referred to as SB 1 or Senate Bill 1, did you take any</p> <p>10 action to become aware of what the changes were as they</p> <p>11 affected you or your daughter?</p> <p>12 A. I -- I heard -- I heard of some things that</p> <p>13 were coming up, but I -- that's probably on the news or</p> <p>14 in the newspaper, but...</p> <p>15 Q. Aside from that, did you get or seek any</p> <p>16 information about those voting law changes in SB 1</p> <p>17 prior to the time that you voted in the 2022 general</p> <p>18 election?</p> <p>19 A. No.</p> <p>20 Q. Let me hand you what's been marked as Scott</p> <p>21 Exhibit 5. This, I believe, is excerpts from Texas</p> <p>22 Secretary of State's website votetexas.gov. Could you</p> <p>23 take a minute or two and go through those page by page</p> <p>24 and see if you recognize any of them.</p> <p>25 A. The only thing that specifically popped up to</p>

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<p style="text-align: right;">Page 38</p> <p>1 me was curbside voting, and there was none -- there was</p> <p>2 no curbside voting in Mercedes.</p> <p>3 Q. My question was whether you recall having seen</p> <p>4 any of --</p> <p>5 A. No.</p> <p>6 Q. -- these pages in Scott Exhibit 5.</p> <p>7 A. No.</p> <p>8 Q. Did you contact the Hidalgo County Elections</p> <p>9 Office either before or after the 2022 general election</p> <p>10 to see whether or not they could provide some</p> <p>11 assistance to Taylor so she would not have to</p> <p>12 physically go into the polling place?</p> <p>13 A. No.</p> <p>14 Q. So you don't know whether or not they could</p> <p>15 have or would have provided such assistance?</p> <p>16 A. I have --</p> <p>17 Q. Did you ask?</p> <p>18 A. -- no idea.</p> <p>19 Q. Okay. Let me show you what has been marked as</p> <p>20 Scott Exhibit 6. This is a document that's entitled</p> <p>21 2021 Impact Report from The Arc Texas. Could you take</p> <p>22 a minute or two and look through that document and tell</p> <p>23 me if you've seen any of those pages.</p> <p>24 A. No, sir. I've never seen any of these pages</p> <p>25 before.</p>	<p style="text-align: right;">Page 40</p> <p>1 probably be in -- probably in January, maybe, of 2020,</p> <p>2 when I looked at her -- her date of expiration and then</p> <p>3 tried to get online and then read that.</p> <p>4 Q. Okay. Did you or anyone in your family make</p> <p>5 any attempt to contact Texas Department of Public</p> <p>6 Safety or anyone else to see whether there was some</p> <p>7 other way that Taylor could get her ID card renewed</p> <p>8 without her physically having to go somewhere to do so?</p> <p>9 A. No. I didn't contact -- it was kind of clear</p> <p>10 on the website, you know, if you've already done it</p> <p>11 before, you couldn't do it again.</p> <p>12 Q. You just testified that you thought you looked</p> <p>13 at the website in January of 2020.</p> <p>14 A. I believe it was. I can't tell you the exact</p> <p>15 date.</p> <p>16 Q. And my recollection is that COVID really hit us</p> <p>17 all in approximately March of 2020, although there was</p> <p>18 some talk about it before then.</p> <p>19 Do you recall when you -- when you looked</p> <p>20 at the website you had already determined that -- that</p> <p>21 the COVID pandemic was the reason why Taylor could not</p> <p>22 physically go in to renew her state ID card?</p> <p>23 MS. SNEAD: Objection, form.</p> <p>24 THE WITNESS: I can still answer?</p> <p>25 MS. SNEAD: Yes.</p>
<p style="text-align: right;">Page 39</p> <p>1 Q. I'll hand you what's been marked as Scott</p> <p>2 Exhibit 7. This appears to be a portion of the Texas</p> <p>3 Department of Public Safety website entitled How to</p> <p>4 Renew your Texas Driver's License, Commercial Driver's</p> <p>5 License, Motorcycle License, or Identification Card.</p> <p>6 Do you recall having seen any or all of</p> <p>7 Scott Exhibit 7?</p> <p>8 A. Yes, I have read this, because I was trying to</p> <p>9 do that for Taylor.</p> <p>10 Q. Approximately when did you take a look at Scott</p> <p>11 Exhibit 7?</p> <p>12 A. I did that probably prior to her ID expiring in</p> <p>13 2020. I went on the website to see if I could do it by</p> <p>14 computer.</p> <p>15 Q. And did you take another look at it at any</p> <p>16 point after that time prior to 2020?</p> <p>17 A. I probably have, but I -- I just remember going</p> <p>18 online and finding out that we couldn't do it by</p> <p>19 computer, and it was like, okay, well, we can't do it</p> <p>20 by computer. So that was kind of it for me, but I</p> <p>21 might have gone online again to, you know, make sure</p> <p>22 what I was reading was correct.</p> <p>23 Q. And when you looked at -- at it online the last</p> <p>24 time you remember was in 2019 or 2020?</p> <p>25 A. It was probably before it expired, so it would</p>	<p style="text-align: right;">Page 41</p> <p>1 A. There was talk of the shutdown, and I don't</p> <p>2 remember if it was January or if it was February. It</p> <p>3 probably was getting close to February. The reason why</p> <p>4 I remember that all of a sudden is because we were in</p> <p>5 Mexico, and we came back from Mexico, and that was --</p> <p>6 it was going to lock down.</p> <p>7 And so that's probably when I did it. I</p> <p>8 don't, you know, remember the exact month, but</p> <p>9 that's -- you know, I try to keep Taylor's stuff</p> <p>10 up-to-date as much as possible. Actually, her -- I</p> <p>11 renewed her passport during COVID because I looked at</p> <p>12 it and went, "Oh, my gosh," you know. It was elapsing,</p> <p>13 so there again.</p> <p>14 Q. And were you able to renew Taylor's passport</p> <p>15 without having to physically take her somewhere?</p> <p>16 A. I took her to -- no. I took her to the CVS,</p> <p>17 and I talked to the gentleman there, and they</p> <p>18 basically -- it was great. They put everybody toward</p> <p>19 the back of the store, and they -- I told them, "Okay.</p> <p>20 I'm going to go get her, and she's medically fragile."</p> <p>21 And they were just wonderful, and they</p> <p>22 snapped her picture, and that was it. And I could take</p> <p>23 her out, and -- and it was great. We pulled down her</p> <p>24 mask for two seconds, pulled it back up, and out the</p> <p>25 store we went. They were really kind, very kind.</p>

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Pages 42 to 45

<p style="text-align: right;">Page 42</p> <p>1 Q. And do you know whether or not the Texas 2 Department of Public Safety would have done something 3 similar had you requested that accommodation? 4 A. I have no idea. 5 Q. Let me hand you what's been marked as Scott 6 Exhibit 8. I'd like for you to take a minute to look 7 through that page by page and tell me if you recognize 8 any of those pages in Scott Exhibit No. 8. 9 A. And your question was that I've seen that? 10 Q. Do you recognize any of the pages in Scott 11 Exhibit -- 12 A. Yes, I do. I renew all our vehicles. I don't 13 have the app on my phone because -- but I do go online 14 to renew our vehicles. 15 Q. Okay. Have you ever made any attempt to take 16 care of any transactions for your daughter Taylor on 17 that Texas State app? 18 A. No. 19 Q. Were you aware that among the transactions that 20 can be taken care of on the Texas State app is state ID 21 renewal? 22 A. I would assume so. 23 Q. Did you make any attempt to renew Taylor's 24 state ID card through the Texas government app, 25 sometimes referred to as Texas by Texas or TxT?</p>	<p style="text-align: right;">Page 44</p> <p>1 on the website. 2 Q. And when you refer to the "website," are you 3 talking about the Texas Department of Public Safety 4 website? 5 A. Texas Department of Public Safety. Excuse me. 6 MR. BRYANT: Okay. Thank you very much, 7 Ms. Scott. 8 I'm going to pass the witness. 9 EXAMINATION 10 BY MS. SNEAD: 11 Q. Just a few questions for you. 12 A. Sure. 13 Q. I believe you said you assisted Taylor with 14 voting in the 2022 general election. Was that right? 15 A. That is correct. 16 Q. What ID did Taylor use to vote in person in the 17 2022 general election? 18 A. Her passport. We took the passport because the 19 ID was expired. 20 Q. And was she able to vote after she showed her 21 United States passport in Hidalgo County in the 2022 22 general election? 23 A. Yes, ma'am. 24 Q. Have you received e-mail communications from 25 REV UP Texas?</p>
<p style="text-align: right;">Page 43</p> <p>1 A. No. 2 Q. Why did you not do so? 3 A. I didn't know you could renew by the app. I 4 don't have the app on my phone. I just have a laptop, 5 and I don't have the app on there. I just go to the 6 old site to renew the vehicles. I don't do any -- I 7 try and -- I got a new phone, and I really don't know 8 how to use it. 9 I don't -- I don't even have a message on 10 my phone because I can't find where to put the -- I'm 11 not real good at this stuff. I'm kind of self-taught. 12 I do what I need to, and that's about it. 13 Q. Let me hand you what's been marked as Scott 14 Exhibit 9. Could you look through Scott Exhibit 9 and 15 tell me if you have seen Scott Exhibit 9 or any portion 16 thereof before today? 17 A. I don't recall seeing it, but I probably have. 18 Q. Do you have any recollection of the occasion on 19 which you saw Scott Exhibit 9? 20 A. No. 21 Q. Let me hand you what's been marked Scott 22 Exhibit 10. Could you take a moment and look through 23 Scott Exhibit 10 and tell me if you recognize Scott 24 Exhibit 10 or any part of it. 25 A. I don't recall seeing that, but it probably was</p>	<p style="text-align: right;">Page 45</p> <p>1 A. Yes, I have. 2 MS. SNEAD: No further questions. 3 MS. TOGNETTI: No questions from Hidalgo 4 County. 5 MR. BRYANT: Okay. Does anybody on Zoom 6 have any questions for the witness? 7 Let the record reflect that we hear none, 8 so at this point, let's declare Ms. Scott's deposition 9 complete. Thank you. 10 (Deposition concluded) 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>